

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
NO. 7:20-CR-167-5M2

UNITED STATES OF AMERICA

v.

JOSEPH MAURINO

**MOTION TO MODIFY TERMS OF
PRE-TRIAL RELEASE**

NOW COMES the Defendant and moves to modify the terms of pre-trial release.

1. The Defendant pled guilty in April 2023
2. Defendant has been on pre-trial release residing with his parents in New Jersey since late August 2021; he is supervised by the Probation Office of the federal District of New Jersey.
3. He has been in compliance, with no violations of his pre-trial conditions.
4. He requests that his curfew conditions be modified to allow him to leave the home at 7:00 am each morning and return no later than 11:00 pm each evening.
5. The Government and United States Probation in the EDNC have been consulted and do not object to this modification of Mr. Maurino's pre-trial condition.

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WHEREFORE, the Defendant respectfully moves this Court to modify the conditions as described in Paragraph 5 of this Motion.

This the 21st day of September, 2023.

/s/ Damon Chetson
Damon J. Chetson
Counsel for the Defendant (Retained)
NC Bar #39575
19 W. Hargett St., Suite 400
Raleigh, NC 27601
Office: (919) 352-9411

E-Mail: damon@chetson.com

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing pleading was served upon opposing counsel by
via CM/ECF.

This the 21st day of September 2023.

/s/ Damon Chetson

Damon J. Chetson

Counsel for the Defendant (Retained)

NC Bar #39575

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